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**FILED**  
Clerk  
District Court

**MAY 10 2006**

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

Attorney for Plaintiff.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE NORTHERN MARIANA ISLANDS**

SAIPAN HANDICRAFT,	]	Civil Action No. 05-0040
	]	
Plaintiff,	]	<b>MOTION FOR EXPANDED</b>
vs.	]	<b>PRELIMINARY INJUNCTION</b>
	]	<b>and FOR EXPEDITED HEARING</b>
MICRONESIA WOODCRAFT ENT., INC., et al.,	]	
	]	Date:
Defendants.	]	Time:
	]	Judge: Hon. Alex R. Munson
	]	
	]	

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**Motion for Expanded Injunction**

1. Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Saipan Handicraft ("Handicraft"), hereby respectfully moves this Court for an expanded preliminary injunction order to stop all Defendants from counterfeiting, and selling counterfeits, of its trademarks and six (6) specific trade dress marks, from infringing upon its rights at common law and under the Federal Trademark Act of 1946, 15 U.S.C. §§ 1051, *et seq.*, from interfering with its business contracts and relations, competing unfairly and engaging in fraud during the pendency of this suit.

**Motion to Expedited Hearing**

2. Further Handicraft moves this Court for this Court to set an expedited hearing on this motion as well as an expedited schedule for any opposition or reply deemed necessary by this Court; such expedited hearing measures necessary to prevent any further injustice or damages.

**Grounds**

3. As grounds for these motions, Handicraft relies on its first amended verified

**ORIGINAL**

complaint, the memorandum accompanying this motion, as well as the declarations and exhibits in support thereof.

Respectfully submitted this 5-10-06.

A handwritten signature in black ink, appearing to read 'F. Matthew Smith', written over a horizontal line.

F. MATTHEW SMITH  
Attorney for Plaintiff Saipan Handicraft